

Jorgensen, Jay T.

From: George, Robert [Robert.George@tyson.com]
Sent: Saturday, July 12, 2008 02:31 PM
To: David Page
Cc: Bond, Michael R.; Burns, Bryan; Jorgensen, Jay T.
Subject: Follow Up Items from July 11 Teleconference with Dr. Engel

David,

This e mail confirms my understanding of your and Dr. Engel's agreement to produce the following electronic modeling files which were identified during the telephone conference between attorneys and experts yesterday but not included in the productions of Dr. Engel's considered materials:

1. The input and output files for the results of the GLEAMS hydrology calibration for Caney Creek shown in Figure 9, Appendix D, of Dr. Engel's expert report.
2. A subdirectory named "Second Stage" under \Engel\Materials\1GLEAMS. This subdirectory contains GLEAMS input and output files for hydrology and nutrients, executables, and batch files. The subdirectory "Second Stage" contains separate subdirectories for Baron Fork and the Illinois River. It may also contain a third separate subdirectory for Caney Creek, but this needs to be confirmed.
3. A file containing GLEAMS model outputs for daily TP loads for the base period (1997-2006).
4. A file named "Lake.zip" is in the directory Engel\Materials\p_data. This file contains a program (Shuffled Complex Evolution Algorithm) used to produce the coefficients a, b and c, and Paccumulation in the phosphorous routing model. There should be three separate files corresponding to the USGS gauging stations at Tahlequah, Baron Fork and Caney Creek. The location to which the file "Lake.zip" corresponds could not be determined. The files for the other two locations could not be found. The location to which the file "Lake.zip" corresponds needs to be determined and the files for the other two locations need to be found or produced.
5. Dr. Engel indicated that there should be routing model spreadsheets for each of the nine scenarios conducted with the GLEAMS and routing models. We are still trying to determine whether all of these spreadsheets are included in the materials produced to date by Plaintiffs. If Dr. Engel can direct us to these spreadsheets within his production, that would be appreciated.

In addition, Dr. Engel could not clarify during the call the order of execution of the following two files for the GLEAMS hydrology calculations: (1) GLMEAMS301.EXE; and (2) SCEGLEAMS.EXE, but agreed to do so in writing through you after the call.

Finally, Dr. Engel provided two corrections or clarifications during the call which we would like to confirm. First, the file "2input.zip" was produced by the Plaintiffs on June 26 contains the spreadsheet "routing.xls" for the phosphorus routing model. The file "routing.xls" is not the correct version. The correct version is "p_model.xls" that was included in the original materials produced by the Plaintiffs. Dr. Engel stated that "p_model.xls" corresponds to the results in his expert report. Second, Dr. Engel stated during the call that the units for phosphorus loading in "p_model.xls" are labeled incorrectly. They should be kg/day not lbs/day.

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If I misstated Dr. Engel's agreement to produce or identify the missing computer modeling files or the clarifications provided by Dr. Engel during the call, please let me know. Otherwise, please produce the above-described electronic files at your earliest possible convenience. As you know, the production of these files is essential to Dr. Bierman's ongoing attempts to replicate or assemble a copy of the working models upon which Dr. Engel relied in offering the opinions in his expert report.

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